

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

GARY FRISCH, *et al.*, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

FCA US LLC,

Defendant.

Case No. 2:24-cv-10546-BRM-KGA

Hon. Brandy R. McMillion

Magistrate Judge Kimberly G. Altman

**PLAINTIFFS’ NOTICE REGARDING MOTION TO APPOINT INTERIM
CO-LEAD COUNSEL [ECF NO. 31]**

On January 3, 2025, Plaintiffs filed a Motion asking the Court to appoint their counsel as Interim Co-Lead Counsel pursuant to Fed. R. Civ. P. 23(g), and to apply that Order and appointment to any other case filed in or transferred to this District that involves the same subject matter and alleged defect as this lawsuit. ECF No. 31 (“Motion”). The Motion is fully briefed. *See* ECF Nos. 33, 34. In their Motion, Plaintiffs noted that one related action had already been filed as of that time, and that “the likelihood of additional cases being filed is high given the recent recall announcement and additional factual developments that continue to become public.” ECF No. 31, PageID.5147.

Plaintiffs file this Notice to update the Court that since Plaintiffs filed their Motion, at least three other related actions have been filed in federal courts regarding

the same subject matter and defect at issue in this case: *Paris v. FCA US, LLC*, Case No. 4:25-cv-10045 (E.D. Mich.) (complaint attached as **Ex. A** hereto) (this matter was voluntarily dismissed by the plaintiff following efforts by proposed Interim Co-Lead Counsel, as discussed ECF No. 34, PageID.5546); *Fishon v. Stellantis N.V. & FCA US LLC*, No. 2:25-cv-01233-NJC-LGD (E.D.N.Y.) (operative complaint attached as **Ex. B** hereto); and *Gandelman v. FCA US, LLC*, No. 2:25-cv-10605-BRM-KGA (E.D. Mich.) (operative complaint attached as **Ex. C** hereto). Plaintiffs respectfully submit that the filing of these additional cases, and the possibility that yet more related cases will be filed in and/or transferred to this District, reinforces the appropriateness of appointing Interim Co-Lead Counsel in this case to promote efficiency and protect the best interests of the proposed class. *See* Manual for Complex Litig. § 21.11 (4th ed. 2004).

DATED: April 16, 2025

Respectfully submitted,

/s/ Dennis A. Lienhardt

E. Powell Miller (P39487)

Dennis A. Lienhardt (P81118)

Dana E. Fraser (P82873)

THE MILLER LAW FIRM PC

950 W. University Drive, Suite 300

Rochester, MI 48307

Telephone: (248) 841-2200

epm@millerlawpc.com

dal@millerlawpc.com

def@millerlawpc.com

Roger N. Heller

Phong-Chau G. Nguyen

Nicholas W. Lee
**LIEFF CABRASER HEIMANN & BERNSTEIN,
LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
rheller@lchb.com
pgnguyen@lchb.com
nlee@lchb.com

John R. Davis
SLACK DAVIS SANGER, LLP
6001 Bold Ruler Way, Suite 100
Austin, TX 78746
Telephone: (512) 795-8686
jdavis@slackdavis.com

Robert K. Shelquist
Craig S. Davis
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Ave., Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
rkshelquist@locklaw.com
csdavis@locklaw.com

Proposed Interim Co-Lead Counsel

Todd M. Friedman
Adrian R. Bacon
Meghan E. George
**LAW OFFICES OF
TODD M. FRIEDMAN, P.C.**
21031 Ventura Blvd, Suite 340
Woodland Hills, CA 91364
Phone: 323-306-4234
Fax: 866-633-0228
tfriedman@toddfllaw.com
abacon@toddfllaw.com
mgeorge@toddfllaw.com

*Additional Counsel for Plaintiffs and the
Class*